

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :

**VERIFIED ANSWER**

- v. - :

10 CV 4142

\$204, 975. 00, IN UNITED STATES :  
CURRENCY, :

Defendant-in-Rem :  
-----X

Defendant \$204, 975 IN UNITED STATES CURRENCY, by its attorney William T. Martin, Esq. hereby states and alleges in their verified answer to the above complaint that:


- 1) Defendant admits that this action is brought pursuant to 21 U.S.C. § 881 (a) (6) but denies that DEFENDANT CURRENCY constitutes moneys furnished or intended to be furnished in exchange for a controlled substance, proceeds traceable to such an exchange and/or moneys used or intended to be used to facilitate such an exchange.
- 2) Admits the averments in paragraph "2", "3", "4" of the complaint.
- 3) Denies information sufficient to admit or deny the averments in paragraph "5", "6", "7", "8", "9", "10", "11".
- 4) Admits the averments of paragraph "12", and alleges that upon information and belief that an additional \$21,000 is missing from the DEFENDANT CURRENCY.
- 5) Denies information sufficient to admit or deny the averments in paragraph "13", "14", "15", "16", "17".

WHEREFORE, defendant \$204,975.00 IN UNITED STATES CURRENCY denies any criminal wrongdoing and further, contests and opposes the seizure which is in violation of due process of law and any forfeiture of said monies in violation of law; and such other

and further relief as this Court may deem just and proper together with the costs and  
disbursements of this action.

Dated: Bronx, New York  
October 27, 2010

Respectfully submitted,

A handwritten signature in cursive script, reading "William T. Martin". The signature is written in dark ink and is positioned above a horizontal line.

WILLIAM T. MARTIN, ESQ.  
945 East 226 Street  
Bronx, New York 10466  
Telephone: (347) 843 - 8655

**ATTORNEY'S VERIFICATION**

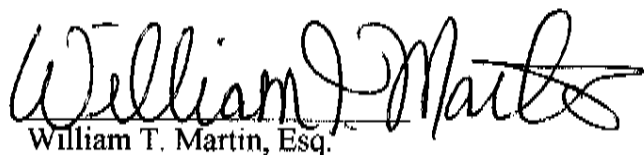
STATE OF NEW YORK     }  
                                      }SS:  
COUNTY OF THE BRONX }

**WILLIAM T. MARTIN, ESQ.**, an attorney duly admitted to practice law before all the Courts of the State of New York and elsewhere hereby affirms, under penalties of perjury:

I am the attorney of record for the plaintiff in the within action; and as such I am fully familiar with the facts and circumstances surrounding this case, that he has read the foregoing **VERIFIED ANSWER** and knows the contents thereof; that the same is true to his own knowledge, except as to the matters therein stated to be alleged upon information and belief, and as to those matters he believes it to be true.

Deponent further says that the reason this **VERIFIED ANSWER** is verified by the attorney rather than the Plaintiff, is because your Plaintiff lives outside of the county where I, William T. Martin, Esq., maintain my offices.

Dated: Bronx, New York  
October 27, 2010

  
William T. Martin, Esq.